

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

FRANKLIN A. ROTHMAN
JEREMY SCHNEIDER
ROBERT A. SOLOWAY
DAVID STERN

Tel: (212) 571-5500
Fax: (212) 571-5507

RACHEL PERILLO

July 3, 2019

Via ECF

Hon. Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nancy Salzman
18 Cr. 204 (NGG)

Dear Judge Garaufis:

I together with Robert Soloway represent Nancy Salzman in this matter. I write with the consent of Moira Kim Penza on behalf of the government, and Michal Dorn, Ms. Salzman's pre-trial officer, seeking modifications of Ms. Salzman's conditions of release. Specifically, we seek to have Ms. Salzman's curfew lifted and her obligation to be subject to electronic monitoring removed. We make this request at this time because the trial in this matter has been completed and therefore many of the reasons justifying these conditions no longer exist.

If you have any questions regarding this application please contact my office.

Respectfully submitted,



David Stern

cc: All Counsel of Record